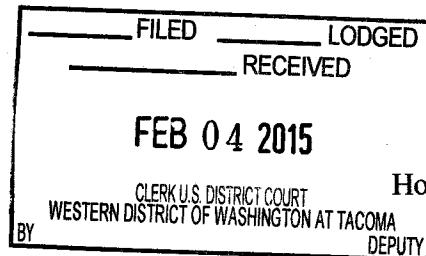


Case 3:13-mc-05037-BHS Document 57-1 Filed 02/02/15 Page 1 of 3



Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON, AT TACOMA

8 EMPLOYEE PAINTERS' TRUST HEALTH
 9 & WELFARE FUND; WESTERN
 10 WASHINGTON PAINTERS DEFINED
 11 CONTRIBUTION PENSION TRUST;
 12 DISTRICT COUNCIL NO. 5
 13 APPRENTICESHIP AND TRAINING TRUST
 14 FUND; WESTERN WASHINGTON
 15 PAINTERS LABOR MANAGEMENT
 16 COOPERATION TRUST; INTERNATIONAL
 17 UNION OF PAINTERS AND ALLIED
 18 TRADES INDUSTRY PENSION FUND; and
 19 INTERNATIONAL UNION OF PAINTERS
 20 AND ALLIED TRADES DISTRICT
 21 COUNCIL NO. 5

22 Plaintiffs / Judgment Creditors,

23 v.

24 STEVEN RAY FREEMIRE and JOAN
 25 MARIE FREEMIRE, husband and wife and the
 26 marital community comprised thereof; and
 27 PICTURE PERFECT PAINTING, INC., a
 28 Washington corporation,

Defendants / Judgment Debtors,

and

CORTINAS PAINTING AND
 RESTORATION, INC.,

Garnishee.

Case No. 3:13-mc-5037-BHS

[Proposed]
**JUDGMENT ON ANSWER OF
 GARNISHEE CORTINAS PAINTING
 AND RESTORATION, INC. AND
 ORDER TO PAY**

(Steven Ray Freemire)

25 ///

26

27 Proposed Judgment on Answer of Garnishee
 28 Cortinas Painting and Restoration, Inc. and Order
 to Pay (Steven Ray Freemire)
 (Case No. 3:13-mc-5037-BHS)

THE URBAN LAW FIRM
 and
 CHRISTENSEN JAMES & MARTIN
 800 Bellevue Way NE, Suite 400
 Bellevue, WA 98004
 P. (425) 646-2394 / (702) 968-8087
 F. (425) 462-5638 / (702) 968-8088
 murban@theurbanlawfirm.com
Counsel for Plaintiffs

Case 3:13-mc-05037-BHS Document 57-1 Filed 02/02/15 Page 2 of 3

I. JUDGMENT SUMMARY

1 Judgment Creditors: Employee Painters' Trust Health & Welfare Fund;
 2
 3 Western Washington Painters Defined Contribution
 4 Pension Trust; District Council No. 5 Apprenticeship
 and Training Trust Fund;
 5 Western Washington Painters Labor Management
 Cooperation Trust;
 6 International Union of Painters and Allied Trades
 7 Industry Pension Fund; and
 8 International Union of Painters and Allied Trades
 District Council No. 5
 9
 Garnishment Judgment Debtor (Garnishee): Cortinas Painting and Restoration, Inc.
 10
 Garnishment Judgment Amount: \$2,933.58
 11
 Costs Judgment Debtor (Defendant): Steven Ray Freemire
 12
 Costs Judgment Amount: \$270.07
 13
 Attorney for Judgment Creditor: Michael A. Urban, Esq., WA State Bar #20251
 14 Sean W. McDonald, Esq., WA State Bar #48542
 15 800 Bellevue Way NE, Suite 400
 Bellevue, WA 98004
 16 P. (425) 646-2394 / (702) 968-8087
 F. (425) 462-5638 / (702) 968-8088
 17 E-mail: murban@theurbanlawfirm.com
 smcdonald@theurbanlawfirm.com

II. BASIS

19 IT APPEARING THAT Garnishee Cortinas Painting and Restoration, Inc. was indebted to
 20 Defendant Steven Ray Freemire in the non-exempt amount of \$2,933.58; that at the time the Writ of
 21 Garnishment was issued defendant was employed by or maintained a financial institution account with
 22 garnishee, or garnishee had in its possession or control funds, personal property, or effects of defendant;
 23 and that plaintiff has incurred recoverable costs and attorney fees of \$270.07; now, therefore, it is hereby

III. ORDER

25 ORDERED as follows:

28 Proposed Judgment on Answer of Garnishee
 Cortinas Painting and Restoration, Inc. and Order
 to Pay (Steven Ray Freemire)
 (Case No. 3:13-mc-5037-BHS)

THE URBAN LAW FIRM
 and
 CHRISTENSEN JAMES & MARTIN
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Counsel for Plaintiff

Case 3:13-mc-05037-BHS Document 57-1 Filed 02/02/15 Page 3 of 3

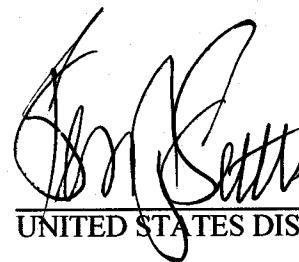
1 1. The Plaintiffs are awarded judgment against Garnishee Cortinas Painting and
2 Restoration, Inc. in the amount of \$2,933.58;

3 2. The Plaintiffs are awarded judgment against Defendant in the amount of \$270.07
4 for recoverable costs, as stated on the writ of garnishment and return of service; and

5 3. Garnishee Cortinas Painting and Restoration, Inc. shall pay its judgment to the
6 Plaintiffs' attorney through the registry of the Court and the Clerk of Court shall note receipt
7 thereof and forthwith disburse such payment to Plaintiffs' attorney.

8 Garnishee is advised that failure to pay this judgment amount may result in execution of the
9 judgment against it, including garnishment.

10 Dated this 11 of February, 2015.



UNITED STATES DISTRICT JUDGE

15 Submitted by:

16 **THE URBAN LAW FIRM**

17 /s/ Sean W. McDonald
18 Michael A. Urban, Esq., WA State Bar #20251
19 Sean W. McDonald, Esq., WA State Bar #48542
20 800 Bellevue Way NE, Suite 400
Bellevue, WA 98004
P. (425) 646-2394 / (702) 968-8087
F. (425) 462-5638 / (702) 968-8088
E-mail: murban@theurbanlawfirm.com
Attorney for Plaintiffs / Judgment Creditors

27 Proposed Judgment on Answer of Garnishee
28 Cortinas Painting and Restoration, Inc. and Order
to Pay (Steven Ray Freemire)
(Case No. 3:13-mc-5037-BHS)

THE URBAN LAW FIRM
and
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murban@theurbanlawfirm.com
Counsel for Plaintiffs

EXHIBIT A

Case 3:13-mc-05037-BHS Document 57-2 Filed 02/02/15 Page 2 of 5

Case 3:13-mc-05037-BHS Document 50 Filed 12/15/14 Page 1 of 4

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5

UNITED STATES DISTRICT COURT

6

WESTERN DISTRICT OF WASHINGTON, AT TACOMA

7

EMPLOYEE PAINTERS' TRUST HEALTH &
WELFARE FUND; WESTERN
WASHINGTON PAINTERS DEFINED
CONTRIBUTION PENSION TRUST;
DISTRICT COUNCIL NO. 5
APPRENTICESHIP AND TRAINING TRUST
FUND; WESTERN WASHINGTON
PAINTERS LABOR MANAGEMENT
COOPERATION TRUST; INTERNATIONAL
UNION OF PAINTERS AND ALLIED
TRADES INDUSTRY PENSION FUND; and
INTERNATIONAL UNION OF PAINTERS
AND ALLIED TRADES DISTRICT
COUNCIL NO. 5

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Case No.: MC13-5037BHS

CERTIFICATE OF MAILING

(Garnishment, Continuing Lien
on Earnings of Steven Freemire)

Plaintiffs / Judgment Creditors,

v.

STEVEN RAY FREEMIRE and JOAN
MARIE FREEMIRE, husband and wife and the
marital community comprised thereof; and
PICTURE PERFECT PAINTING, INC., a
Washington corporation,

Defendants / Judgment Debtors,

and

CORTINAS PAINTING AND
RESTORATION, INC.,

Garnishee.

///

Certificate of Mailing (Garnishment, Continuing
Lien on Earnings of Steven Freemire)
(Case No. MC13-5037BHS)

THE URBAN LAW FIRM

and

CHRISTENSEN JAMES & MARTIN

800 Bellevue Way NE, Suite 400

Bellevue, WA 98004

P. (425) 646-2394 / (702) 968-8087

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murban@theurbanlawfirm.com

ejj@cjmvlv.com

Counsel for Plaintiffs

Case 3:13-mc-05037-BHS Document 57-2 Filed 02/02/15 Page 3 of 5

Case 3:13-mc-05037-BHS Document 50 Filed 12/15/14 Page 2 of 4

The undersigned STATES that:

1.1 I am a citizen of the State of Nevada, I am over the age of 18 years, and I am not a party to this
2 action.

3 1.2 On November 25, 2014 at 2:45p.m. at Las Vegas, NV, I mailed to defendant Steven Ray Freemire
4 at P.O. Box 1148 Graham, WA, 98338 by postage prepaid certified mail, return receipt requested or
5 electronic return receipt delivery confirmation requested, the following document(s):
6

- 7 Writ of Garnishment (Debts Other Than Earnings)
8 Writ of Garnishment for Continuing Lien on Earnings
9 Judgment Creditor's Writ Application
10 Notice of Garnishment and of Your Rights
11 Exemption Claim
12 Notice to Defendant of Non-Responsive Exemption Claim
13 Other: _____
14 Other: _____

15 The return receipt (green card), or the certified envelope if unclaimed or undeliverable, or electronic
16 return receipt delivery confirmation is attached to this certification.
17

1.3 On November 25, 2014 at 2:45p.m. at Las Vegas, NV I mailed to garnishee Cortinas Painting and
14 Restoration, Inc., at 700 Yuma St., Milton, WA 98354, by postage prepaid certified mail, return
15 receipt requested, or electronic return receipt delivery confirmation requested, the following
16 document(s):
17

- 18 For debts other than earnings:
19 • Writ of Garnishment (Debts Other than Earnings); and
20 • Answer to Writ of Garnishment (Debts other than Earnings); and
21 • Check or money order made payable to the garnishee in the amount of \$20.00.
22
23 For Continuing Lien on Earnings:
24 Writ of Garnishment for Continuing Lien on Earnings; and
25 • First Answer to Writ of Garnishment for Continuing Lien on Earnings
 Second Answer to Writ of Garnishment for Continuing Lien on Earnings
26
27 Notice of Default Against Garnishee
28 Other: _____
29 Other: _____

Certificate of Mailing (Garnishment, Continuing
Lien on Earnings of Steven Freemire)
(Case No. MC13-5037BHS)

THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
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mrbm@theurbanlawfirm.com
elj@cjmvlv.com
Counsel for Plaintiffs

Case 3:13-mc-05037-BHS Document 57-2 Filed 02/02/15 Page 4 of 5
Case 3:13-mc-05037-BHS Document 50 Filed 12/15/14 Page 3 of 4

1 The return receipt (green card), or the certified envelope if unclaimed or undeliverable, or electronic
2 return receipt delivery confirmation is attached to this certification.

3 I CERTIFY under penalty of perjury under the laws of the State of Washington that the foregoing is true
4 and correct.

5 Dated: December 15, 2014 at Las Vegas, Nevada.

6 Fees: /s/ Krista Taylor-Openbrier
7 Service: \$0.00 Signature
8 Postage: \$ 13.59 Krista Taylor-Openbrier, Paralegal
9 Answer Fee: \$ 0.00 Name and Title
10 Total: \$ 13.59

11 Serving the writ of garnishment:

12 Service of the writ of garnishment (debts other than earnings) is invalid unless the writ is
13 served with an answer form and a check or money order made payable to the garnishee in
14 the amount of twenty dollars (\$20) for the answer fee.

15 Service of the writ of garnishment for continuing lien on earnings is invalid unless the
16 writ is served with an answer form.

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25
Certificate of Mailing (Garnishment, Continuing
Lien on Earnings of Steven Freemire)
(Case No. MC13-5037BHS)

THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
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murban@theurbanlawfirm.com
elj@cjmlv.com
Counsel for Plaintiff's

Case 3:13-mc-05037-BHS Document 57-2 Filed 02/02/15 Page 5 of 5

Case 3:13-mc-05037-BHS Document 50 Filed 12/15/14 Page 4 of 4

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Curtina's Painting and
Restoration, Inc.
700 Yuma St.
Milton, WA 98354

2. Article Number

(Transfer from service)

91 7199 9991 7033 1405 7417

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY**A. Signature** Agent Addressee**B. Received by (Printed Name)**

12-2-14

C. Date of DeliveryD. Is delivery address different from item 1? YesIf YES, enter delivery address below: No**3. Service Type**

- | | |
|--|---|
| <input checked="" type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail |
| <input type="checkbox"/> Registered | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> C.O.D. |

4. Restricted Delivery? (Extra Fee) Yes**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Steven Ray Freanire
P.O. Box 7148
Graham, WA 98338

2. Article Number

(Transfer from service label)

91 7199 9991 7033 1405 7488

PS Form 3811, February 2004

Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY**A. Signature** Agent Addressee**B. Received by (Printed Name)**

12-10-14

C. Date of DeliveryD. Is delivery address different from item 1? YesIf YES, enter delivery address below: No**3. Service Type**

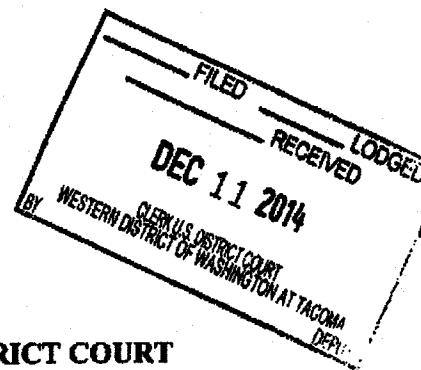
- | | |
|--|---|
| <input checked="" type="checkbox"/> Certified Mail | <input type="checkbox"/> Express Mail |
| <input type="checkbox"/> Registered | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Insured Mail | <input type="checkbox"/> C.O.D. |

4. Restricted Delivery? (Extra Fee) Yes

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EXHIBIT B

Case 3:13-mc-05037-BHS Document 57-3 Filed 02/02/15 Page 2 of 5
Case 3:13-mc-05037-BHS Document 49 Filed 12/11/14 Page 1 of 4



UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON, AT TACOMA

EMPLOYEE PAINTERS' TRUST HEALTH & WELFARE FUND; WESTERN WASHINGTON PAINTERS DEFINED CONTRIBUTION PENSION TRUST; DISTRICT COUNCIL NO. 5 APPRENTICESHIP AND TRAINING TRUST FUND; WESTERN WASHINGTON PAINTERS LABOR MANAGEMENT COOPERATION TRUST; INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES INDUSTRY PENSION FUND; and INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES DISTRICT COUNCIL NO. 5

Plaintiffs / Judgment Creditors,

v.

STEVEN RAY FREEMIRE and JOAN MARIE FREEMIRE, husband and wife and the marital community comprised thereof; and PICTURE PERFECT PAINTING, INC., a Washington corporation.

Defendants / Judgment Debtors,

and

CORTINAS PAINTING AND RESTORATION, INC.,

Garnishee.

Case No.: MC13-5037BHS

FIRST ANSWER TO WRIT OF GARNISHMENT FOR CONTINUING LIEN ON EARNINGS

(Steven Freemire)



13-MC-05037-ANS

THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
800 Bellevue Way NE, Suite 400
Bellevue, WA 98004
P. (425) 646-2394 / (702) 968-8087
F. (425) 462-5638 / (702) 968-8088
murban@theurbanlawfirm.com
cjmlv@cjmlv.com
Counsel for Plaintiffs

Case 3:13-mc-05037-BHS Document 57-3 Filed 02/02/15 Page 3 of 5
Case 3:13-mc-05037-BHS Document 49 Filed 12/11/14 Page 2 of 4

1 **SECTION I.** If you are withholding the defendant's nonexempt earnings under a previously served writ
2 for a continuing lien, answer only sections I and III of this form and mail or deliver the forms as directed
3 in the writ. Withhold from the defendant's future nonexempt earnings as directed in the writ, and a
4 second set of answer forms will be forwarded to you later.

5 If you are NOT withholding the defendant's earnings under a previously served writ for a
6 continuing lien, answer this ENTIRE form and mail or deliver the forms as directed in the writ. A
7 second set of answer forms will be forwarded to you later for subsequently withheld earnings.
8

9 **ANSWER:** I am presently holding the defendant's nonexempt earnings under a previous writ served on
10 _____ (date) that will terminate not later than _____ (date).

11 On the date the writ of garnishment was issued as indicated by the date appearing on the last page of the
12 writ:

13 (A) The defendant: (check one) was, [] was not employed by garnishee. If not employed and you
14 have no possession or control of any funds of defendant, indicate the last day of
15 employment: _____; and complete section III of this answer and mail or deliver
16 the forms as directed in the writ;

17 (B) The defendant: (check one) [] did, did not maintain a financial account with garnishee; and

18 (C) The garnishee: (check one) [] did, did not have possession of or control over any funds,
19 personal property, or effects of the defendant. (List all of defendant's personal property or effects in
20 your possession or control on the last page of this answer form or attach a schedule if necessary.)

21 **SECTION II.** At the time of service of the writ of garnishment on the garnishee there was due and
22 owing from the garnishee to the above-named defendant \$ _____.

23 This writ attaches a maximum of twenty-five percent (25%) of the defendant's disposable
24 earnings (that is, compensation payable for personal services, whether called wages, salary, commission,
25

First Answer to Writ of Garnishment for
Continuing Lien on Earnings (Steven Freemire)
(Case No. MC13-5037BHS)

Case 3:13-mc-05037-BHS Document 57-3 Filed 02/02/15 Page 4 of 5
 Case 3:13-mc-05037-BHS Document 49 Filed 12/11/14 Page 3 of 4

1 bonus, or otherwise, and including periodic payments pursuant to a nongovernmental pension or
 2 retirement program). Calculate the attachable amount as follows:

3 Gross Earnings \$ 1200.00 (1)

4 Less deductions required by law
 (social security, federal withholding tax, etc.)

5 Do not include deductions for child support orders
 6 or government liens here. Deduct child support orders
 and liens on line 7):

7 Disposable Earnings \$ 198.77 (2)
 8 (subtract line 2 from line 1):

9 Enter seventy-five percent (75%) of line 3:

10 Enter one of the following exempt amounts*:
 If paid Weekly \$253.75 Semi-monthly \$507.50
 Bi-Weekly \$507.50 Monthly \$1,015.00

11 *These are minimum exempt amounts that the defendant must
 12 be paid. If your answer covers more than one pay period,
 multiply the preceding amount by the number of pay periods
 13 and/or fraction thereof your answer covers. If you use a pay
 period not shown, prorate the monthly exempt amount.

14 Subtract the larger of lines 4 and 5 from line 3: \$ 250.30 (6)

15 Enter amount (if any) withheld for ongoing
 16 government liens such as child support: \$ 0 (7)

17 Subtract line 7 from line 6. This amount
 18 must be held out for the plaintiff: \$ 250.30 (8)

19 This is the formula that you will use for withholding each pay period over the required sixty day
 20 garnishment period. Deduct any allowable processing fee you may charge from the amount that is to be
 21 paid to the defendant.

22 If there is any uncertainty about your answer, give an explanation on the last page or on an attached
 23 page.

24

25

First Answer to Writ of Garnishment for
 Continuing Lien on Earnings (Steven Freemire)
 (Case No. MC13-5037BHS)

Case 3:13-mc-05037-BHS Document 57-3 Filed 02/02/15 Page 5 of 5
Case 3:13-mc-05037-BHS Document 49 Filed 12/11/14 Page 4 of 4

1 **SECTION III.** An attorney may answer for the garnishee.

2 Under penalty of perjury, I affirm that I have examined this answer, including accompanying schedules,
3 and to the best of my knowledge and belief it is true, correct, and complete.

4

5

Signature of Garnishee Defendant

6

7

Signature of Person Answering for Garnishee

8

9

Tessie J. Cruz
Print Name of Person Signing

12/8/14

Date

Office Manager

Connection with Garnishee

700 Yuma St. Milton, WA 98354

Address of Garnishee

10

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If necessary, use this space to supplement your answer from the first and second pages:

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First Answer to Writ of Garnishment for
Continuing Lien on Earnings (Steven Freemire)
(Case No. MC13-5037BHS)

THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
800 Bellevue Way NE, Suite 400
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P. (425) 646-2394 / (702) 968-8087
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cjj@cjmvl.com
Counsel for Plaintiffs

Case 3:13-mc-05037-BHS Document 57-4 Filed 02/02/15 Page 1 of 5

EXHIBIT C

Case 3:13-mc-05037-BHS Document 57-4 Filed 02/02/15 Page 2 of 5

Case 3:13-mc-05037-BHS Document 55 Filed 01/30/15 Page 1 of 4

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JAN 30 2015	
CLERK U.S. DISTRICT COURT	
WESTERN DISTRICT OF WASHINGTON AT TACOMA	
DEPUTY	

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF WASHINGTON, AT TACOMA

EMPLOYEE PAINTERS' TRUST HEALTH & WELFARE FUND; WESTERN WASHINGTON PAINTERS DEFINED CONTRIBUTION PENSION TRUST; DISTRICT COUNCIL NO. 5 APPRENTICESHIP AND TRAINING TRUST FUND; WESTERN WASHINGTON PAINTERS LABOR MANAGEMENT COOPERATION TRUST; INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES INDUSTRY PENSION FUND; and INTERNATIONAL UNION OF PAINTERS AND ALLIED TRADES DISTRICT COUNCIL NO. 5

Case No.: MC13-5037BHS

SECOND ANSWER TO RENEWED WRIT OF GARNISHMENT FOR CONTINUING LIEN ON EARNINGS

(Steven Freemire)

Plaintiffs / Judgment Creditors,

v.

STEVEN RAY FREEMIRE and JOAN MARIE FREEMIRE, husband and wife and the marital community comprised thereof; and PICTURE PERFECT PAINTING, INC., a Washington corporation,

Defendants / Judgment Debtors,

and

CORTINAS PAINTING AND RESTORATION, INC.,

Garnishee.

Second Answer to Renewed Writ of Garnishment for Continuing Lien on Earnings (Steven Freemire)
(Case No. MC13-5037BHS)

THE URBAN LAW FIRM
and
CHRISTENSEN JAMES & MARTIN
800 Bellevue Way NE, Suite 400
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P. (425) 646-2394 / (702) 968-8087
F. (425) 462-5638 / (702) 968-8088
murban@theurbanlawfirm.com
ejj@cjmlv.com
Counsel for Plaintiffs

Case 3:13-mc-05037-BHS Document 57-4 Filed 02/02/15 Page 3 of 5

Case 3:13-mc-05037-BHS Document 55 Filed 01/30/15 Page 2 of 4

1 SECTION I. ANSWER SECTION II OF THIS FORM WITH RESPECT TO THE TOTAL AMOUNT
 2 OF EARNINGS WITHHELD UNDER THIS GARNISHMENT, INCLUDING THE AMOUNT, IF
 3 ANY, STATED IN YOUR FIRST ANSWER, AND WITHIN TWENTY DAYS AFTER YOU
 4 RECEIVE THESE FORMS, MAIL OR DELIVER THEM AS DIRECTED IN THE WRIT.

5 Nonexempt amount due and owing stated in the first answer \$ 0

6 Nonexempt amount accrued since the first answer \$ 2933.58

7 TOTAL AMOUNT WITHHELD \$ 2933.58

8 SECTION II. At the time of service of the writ of garnishment on the garnishee there was due and
 9 owing from the garnishee to the above-named defendant \$ 0.

10 This writ attaches a maximum of twenty-five percent (25%) of the defendant's disposable
 11 earnings (that is, compensation payable for personal services, whether called wages, salary, commission,
 12 bonus, or otherwise, and including periodic payments pursuant to a nongovernmental pension or
 13 retirement program). Calculate the attachable amount as follows:

14 Gross Earnings \$ 1200.00 (1)

15 Less deductions required by law
 (social security, federal withholding tax, etc.
 16 Do not include deductions for child support orders
 17 or government liens here. Deduct child support orders
 and liens on line 7): \$ 198.08 (2)

18 Disposable Earnings
 (subtract line 2 from line 1): \$ 1001.92 (3)

19 Enter seventy-five percent (75%) of line 3: \$ 751.44 (4)

20 Enter one of the following exempt amounts*: \$ 253.75 (5)

If paid Weekly \$253.75 Semi-monthly \$507.50
 Bi-Weekly \$507.50 Monthly \$1,015.00

22 *These are minimum exempt amounts that the defendant must
 be paid. If your answer covers more than one pay period,
 multiply the preceding amount by the number of pay periods
 and/or fraction thereof your answer covers. If you use a pay
 period not shown, prorate the monthly exempt amount.

25 Subtract the larger of lines 4 and 5 from line 3: \$ 250.48 (6)

Second Answer to Renewed Writ of Garnishment
 for Continuing Lien on Earnings (Steven
 Freemire)
 (Case No. MC13-5037BHS)

THE URBAN LAW FIRM
 and
 CHRISTENSEN JAMES & MARTIN
 800 Bellevue Way NE, Suite 400
 Bellevue, WA 98004
 P. (425) 646-2394 / (702) 968-8087
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 murban@theurbanlawfirm.com
 ejj@cjmlv.com
 Counsel for Plaintiffs

Case 3:13-mc-05037-BHS Document 57-4 Filed 02/02/15 Page 4 of 5
Case 3:13-mc-05037-BHS Document 55 Filed 01/30/15 Page 3 of 4

- 1 Enter amount (if any) withheld for ongoing
2 government liens such as child support: \$ 0 (7)
- 3 Subtract line 7 from line 6. This amount
4 must be held out for the plaintiff: \$ 250.48 (8)
- 5 This is the formula that you will use for withholding each pay period over the required sixty day
6 garnishment period. Deduct any allowable processing fee you may charge from the amount that is to be
7 paid to the defendant.
- 8 If there is any uncertainty about your answer, give an explanation on the last page or on an attached
9 page.

10 **SECTION III.** An attorney may answer for the garnishee.

11 Under penalty of perjury, I affirm that I have examined this answer, including accompanying schedules,
12 and to the best of my knowledge and belief it is true, correct, and complete.

13

14

Signature of Garnishee Defendant

1/28/15
Date

15

Signature of Person Answering for Garnishee

Office Manager
Connection with Garnishee

16

Tessie J. Cruz
Print Name of Person Signing

700 Yuma St. Milton, WA 98354
Address of Garnishee

17

If necessary, use this space to supplement your answer from the first and second pages:

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Second Answer to Renewed Writ of Garnishment
for Continuing Lien on Earnings (Steven
Freemire)
(Case No. MC13-5037BHS)

THE URBAN LAW FIRM
and
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Counsel for Plaintiff

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Second Answer to Renewed Writ of Garnishment
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